

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. \_\_\_\_\_

FRIENDS OF THE EVERGLADES, INC., a Florida not-for-profit corporation, and CENTER FOR BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit organization,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as Secretary of the UNITED STATES DEPARTMENT OF HOMELAND SECURITY; TODD LYONS, in his official capacity as Acting Director of the UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT; KEVIN GUTHRIE, in his official capacity as Executive Director of the Florida Division of Emergency Management; and MIAMI-DADE COUNTY, a political subdivision of the State of Florida;

Defendants.

**DECLARATION OF AMBER CROOKS**

I, Amber Crooks, declare as follows:

1. The facts set forth in this declaration are based on my personal knowledge and if called as a witness, I could and would competently testify to those facts under oath. As to those matters that reflect a matter of opinion, they reflect my personal opinion and judgment upon the matter.

2. I am a member of the Center for Biological Diversity (“Center”) and have been for eight years, since March 2017. I receive action alerts, respond to online petitions, and help with anything I can for the wider efforts of the Center. I rely on the Center to represent my

interests in conserving endangered species and their habitats, including species like the Florida panther, Florida bonneted bat, wood stork, Everglade snail kite, red cockaded woodpecker, eastern indigo snake, and places like Big Cypress National Preserve and Everglades National Park.

3. My entire career has also been deeply tied to conservation. I have a master's degree in public administration with a concentration in Environmental Policy from Florida Gulf Coast University. I have advocated for the protection of the Big Cypress National Preserve and many endangered and threatened species. For example, I have advocated for stronger habitat protections for Florida bonneted bats and worked for decades to protect Florida panthers from poorly sited development projects that destroy their habitat and contribute to increased panther-vehicle mortality (deaths by car crash).

4. In the past, I volunteered with the Florida Panther National Wildlife Refuge for about 10 years. The Refuge is part of the Greater Everglades Ecosystem and shares a boundary with the Big Cypress National Preserve. While volunteering at the Refuge, I helped with projects regarding imperiled species in the area, including the Florida bonneted bat research, Florida panther habitat management, swallowtail kite monitoring, red cockaded woodpecker habitat improvement, and ghost orchid and other native species education. I also volunteered for the Friends of the Florida Panther Refuge ("Friends"), serving as a board member from 2010–2020. I am still a member of the group.

5. I love visiting Big Cypress National Preserve and regularly visit it, about once every season. My goal is to visit each and every one of the Preserve's main access points, and I still have to visit the Mile Marker 51 recreational area and Midway campground.

6. In fact, I plan to visit Big Cypress this Saturday, to join others in defense of the Preserve at the entrance of the site where the detention center is being constructed. While I'm in the area, I also plan to try to take a moment to do something fun in the Preserve.

7. Next week I also plan to visit Shark Valley at Everglades National Park for a day trip, which is close to the location of the detention center.

8. I also plan to visit in the fall, and while I'm there I intend to enjoy hiking, looking for wildlife, and taking photographs. I have attended Preserve-led astronomy programs in the past, and hope to go again this fall/winter.

9. Big Cypress is a special place to me. It is one of our cherished public lands and a natural marvel. Its waters feed aquifers (or drinking water) and much of Everglades National Park. It also safeguards over 350 wildlife species, making it incredibly fascinating and biodiverse. When you're in Big Cypress, you can feel the quiet peacefulness of being in a truly natural place.

10. On one of my first visits to Big Cypress, I volunteered to survey imperiled Big Cypress fox squirrels. The site I was surveying was in a cypress dome not far from the site where the detention center is now being constructed. While I was working, I felt as if eyes were on me, and I turned to see a barred owl peacefully watching me. It was then that I was hooked.

11. I also saw my first endangered red cockaded woodpecker at Big Cypress, which is an important area for their recovery. During a special agency-led field trip to the red cockaded woodpecker site, we observed the birds coming home to roost at sunset with a rising moon in the background. On a separate occasion, I had the ability to volunteer in the Big Cypress and help monitor red cockaded woodpeckers at a different part of the Preserve in an effort to gather data about this important population.

12. I have spent many wonderful visits at Big Cypress, from watching sunrises over Deep Lake while hoping to spot a Florida panther, to bicycling Bear Island, to kayaking Turner River, to late-night visits to wonder at the starry skies with my friends.

13. The lands and waters in Big Cypress have always held adventure and joy for me and have been the backdrop of many core memories in my lifetime.

14. I have engaged in volunteering activities in the Big Cypress, such as wetland restoration plantings, as well as invasive species eradication days on adjoining properties.

15. In addition to the preserve itself, I also care deeply about the species who live there. For example, endangered Florida panthers once ranged across much of the southeastern United States, but now they are only found in southwest Florida. Their numbers have reduced because of habitat destruction and being hit by cars. There are an estimated 120–230 panthers in the wild, and most years, between 20–30 are hit by cars. Big Cypress is one of a handful of truly protected places within their occupied breeding range.

16. I look for panthers everywhere I go when I'm exploring southwest Florida. Every time I'm in the Big Cypress, whether camping, hiking, or driving down the road, I'm looking for wildlife, including Florida panthers.

17. I also have an appreciation for the Florida bonneted bat, which lives in Big Cypress. It is exceedingly rare, and its habitat is threatened by development and increasingly stronger hurricanes. Thousands of acres have been approved for development in recent years in south Florida, and a fair portion of those areas are within the bat's range. Furthermore, thousands of acres more are at risk from pending development applications. With the growing threat from development, protected public lands like Big Cypress National Preserve are an important part of preventing the bat's extinction and facilitating its recovery.

18. I have been to a Florida bonneted bat roost in the Florida Panther National Wildlife Refuge as a volunteer. I was able to assist with data collection at one of only two known natural roosts at the time. The roost tree was in a sheltered and secluded area, and it felt like we were looking for a pirate's treasure to find that one specific tree in a forest of lookalikes. It was an amazing experience. When the bats come out of the roost, they must drop down before they can fly. There is almost a feeling that they are falling on top of you, and it was exciting to hear their calls and the sound of their wings flapping.

19. I have sought out opportunities to see the bat in its natural habitat. I enjoy hiking, camping, kayaking, and birdwatching in Florida bonneted bat habitat, including Big Cypress National Preserve. Part of my enjoyment of the experience is knowing that I am in this endangered bat's habitat and that I might see one.

20. I also enjoy observing native birds like endangered red-cockaded woodpeckers, threatened wood storks and other wading birds, threatened crested caracara, and rare migratory songbirds.

21. I understand that Florida and the federal government are working together to construct and operate an immigration detention center on an area known as Dade-Collier Training and Transition Airport, a training airstrip for pilots.

22. Because of how rushed the construction of the detention center has been, I understand there has been no public process: no publicly available permit materials or plans for members of the public to further understand what is envisioned, what the full environmental impacts will be, and how those impacts will be avoided or offset. If I was aware of such publicly available information, opportunities for public comment, or attendance at a meeting, I would certainly participate in the decision-making process, however the project is already

under way without such opportunities. So I had no opportunity to represent my interests in conserving and protecting Big Cypress.

23. Despite that lack of information, it is clear that intensification of use in this area (more people with their associated vehicles, waste, and water consumption) is a great cause for concern for the delicate ecosystems in Big Cypress. I believe it could harm many of the qualities that make Big Cypress so special to me.

24. I understand that this center could detain 1,000 or more people in an area with no known existing water or wastewater infrastructure. It logically follows that even more people will need to be on the site as guards, administrators, facilities support, and more. These people will create waste—gray water, solid waste, and human refuse. The scale of sanitation and handling wastewater from showering and daily needs is a concern. I understand that fuel may be needed to run generators on site. Transporting in all these pollutants risks contaminating Big Cypress, if it is not handled appropriately.

25. All the activity anticipated with building a detention center—light, noise, and the presence of humans—is likely to impact wildlife that use the area. For example, I believe there's a real risk that panthers will decrease their use of the area,<sup>1</sup> even though I know (based on publicly available telemetry data) that they have been documented on the site and surrounding areas.

26. I believe this project may require artificial lighting, which will likely affect wildlife and Big Cypress's famously dark skies. I heard from a park ranger that Big Cypress

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<sup>1</sup> Frakes, R.A., Belden, R.C., Wood, B.E. and James, F.E., 2015. Landscape analysis of adult Florida panther habitat. *PLoS One*, 10(7), p.e0133044 (describing how, in a habitat model for Florida panthers, “[s]mall increases in human density were predicted to have a pronounced negative effect on the probability of panther presence”).

has the darkest skies east of the Mississippi. In 2016, the Big Cypress was designated as an International Dark Sky Place. I understand that only about 200 other places around the world have such a designation, so this issue stands out to me as very pressing and concerning. The likely need to add more lighting stands out to me as a big problem.

27. The risk posed by these impacts harms my ability to enjoy recreating and beholding the beauty of Big Cypress. For example, I went to an event a while ago where I took a bicycle ride by moonlight at Shark Valley in Everglades National Park, enjoying the starry skies. I would like to do it again. I also enjoy camping in Big Cypress. But I believe that light pollution will harm my enjoyment of the night sky when I'm in areas near the detention center.

28. I also believe the intensification and potential for increased traffic would harm my enjoyment of panthers in Big Cypress. There are a number of panthers who have been struck by vehicles within a few miles of the site. With more vehicles coming to the site, I believe the risk of panthers being hit by cars will increase. This would mean fewer opportunities to see panthers, and also it would hurt my enjoyment of them knowing they could be at greater risk.

29. If the federal agencies involved had completed their obligations under the National Environmental Policy Act, I and the rest of the public would have a better understanding of this project, and we can be better informed about what is being proposed in lands that I and many people care deeply about. We would also have the assurance that the full environmental impact of the construction and operation of the detention center, and less harmful alternatives, were considered.

I declare under penalty of perjury that the foregoing is true and correct and was executed on June 27, 2025, in Fort Myers, Florida.



Amber Crooks